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10 Attorneys for Plaintiff,
Dorothy Stewart

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

Dorothy Stewart,

Plaintiff.

vs.

CMRE Financial Services, Inc.; and
DOES 1-10, inclusive.

Defendants

Case No.: SACV14-00123 DOC (DFMx)

COMPLAINT FOR DAMAGES

1. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692 ET. SEQ;
 2. VIOLATION OF FAIR DEBT COLLECTION PRACTICES ACT, CAL.CIV.CODE § 1788 ET. SEQ.
 3. VIOLATION OF THE TELEPHONE CONSUMER PROTECTION ACT - 47 U.S.C. § 227 ET. SEQ.

JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES

1 For this Complaint, the Plaintiff, Dorothy Stewart, by undersigned counsel,
2
3 states as follows:

JURISDICTION

5 1. This action arises out of Defendants' repeated violations of the Fair Debt
6
7 Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("FDCPA"), violations of the
8 Telephone Consumer Protection Act, 47 U.S.C. § 227, *et. seq.* ("TCPA"), and the
9 invasions of Plaintiff's personal privacy by the Defendants and its agents in their
10
11 illegal efforts to collect a consumer debt.

12 2. Supplemental jurisdiction exists pursuant to 28 U.S.C. § 1337.

13 3. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b), in that
14
15 Defendants transact business here and a substantial portion of the acts giving rise to
16 this action occurred here.

PARTIES

19 4. The Plaintiff, Dorothy Stewart (hereafter “Plaintiff”), is an adult
20 individual residing at Cocoa, Florida, and is a “consumer” as the term is defined by 15
21 U.S.C. § 1692a(3), and is a “person” as defined by 47 U.S.C. § 153(10).

23 5. Defendant, CMRE Financial Services, Inc. (“CMRE”), is a California
24 business entity with an address of 3075 East Imperial Highway, #200, Brea, California
25 92821, operating as a collection agency, and is a “debt collector” as the term is
26 defined by 15 U.S.C. § 1692a(6), and is a “person” as defined by 47 U.S.C. § 153(10).
27

6. Does 1-10 (the “Collectors”) are individual collectors employed by CMRE and whose identities are currently unknown to the Plaintiff. One or more of the Collectors may be joined as parties once their identities are disclosed through discovery.

7. CMRE at all times acted by and through one or more of the Collectors.

ALLEGATIONS APPLICABLE TO ALL COUNTS

A. The Debt

8. The Plaintiff allegedly incurred various financial obligations (collectively referred to as the “Debt”) to a creditor(s) (the “Creditor”) for medical services rendered.

9. The Debt arose from services provided by the Creditor which were primarily for family, personal or household purposes and which meets the definition of a “debt” under 15 U.S.C. § 1692a(5).

10. The Debt was purchased, assigned or transferred to CMRE for collection, or CMRE was employed by the Creditor to collect the Debt.

11. The Defendants attempted to collect the Debt and, as such, engaged in “communications” as defined in 15 U.S.C. § 1692a(2).

B. The Facts

12. Plaintiff incurred the Debts for medical services rendered. CMRE contacted Plaintiff in an attempt to collect the Debt by placing telephone calls to her on her cellular telephone.

13. CMRE used an automated or prerecorded voice when it called Plaintiff.

14. During the initial conversation, Plaintiff advised CMRE that she had no financial means with which to repay the Debt and no health insurance, and further directed CMRE to stop calling.

15. Despite instructing CMRE to stop calling and having expressed a complete inability to pay the Debt, CMRE continued to call Plaintiff frequently.

16. Plaintiff spoke to CMRE on many occasions in an effort to stop the calls. During each conversation, Plaintiff expressed her complete inability and unwillingness to pay the Debt, and repeatedly requested that CMRE stop calling.

17. Despite knowing that Plaintiff did not want to be called and knowing that additional calls to Plaintiff would not result in the repayment of the Debt, CMRE nonetheless continued to call Plaintiff at an annoying and harassing rate.

COUNT I
VIOLATIONS OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692, et seq.

18. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

19. The Defendants engaged in behavior the natural consequence of which was to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt, in violation of 15 U.S.C. § 1692d.

20. The Defendants caused a phone to ring repeatedly and engaged the Plaintiff in telephone conversations, with the intent to annoy and harass, in violation of 15 U.S.C. § 1692d(5).

21. The Defendants used unfair and unconscionable means to collect a debt, in violation of 15 U.S.C. § 1692f.

22. The foregoing acts and omissions of the Defendants constitute numerous and multiple violations of the FDCPA, including every one of the above-cited provisions.

23. The Plaintiff is entitled to damages as a result of the Defendants' violations.

COUNT II
**VIOLATION OF THE ROSENTHAL FAIR DEBT COLLECTION
PRACTICES ACT, Cal. Civ. Code § 1788 et seq.**

24. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.

25. The Rosenthal Fair Debt Collection Practices Act, California Civil Code section 1788 *et seq.* (“Rosenthal Act”) prohibits unfair and deceptive acts and practices in the collection of consumer debts.

1 26. CMRE Financial Services, Inc., in the regular course of business,
2 engages in debt collection and is a “debt collector” as defined by Cal. Civ. Code §
3 1788.2(c).
4

5 27. The Defendants caused a telephone to ring repeatedly and engaged the
6 Plaintiff in continuous conversations with an intent to annoy the Plaintiff, in violation
7 of Cal. Civ. Code § 1788.11(d).
8

9 28. The Defendants communicated with the Plaintiff with such frequency as
10 to be considered harassment, in violation of Cal. Civ. Code § 1788.11(e).
11

12 29. The Defendants failed to comply with the provisions of 15 U.S.C. §
13 1692, et seq., in violation of Cal. Civ. Code § 1788.13(e).
14

15 30. The Defendants did not comply with the provisions of Title 15, Section
16 1692 of the United States Code, in violation of Cal. Civ. Code § 1788.17.
17

18 31. The Plaintiff is entitled to damages as a result of the Defendants'
19 violations.
20

COUNT III
VIOLATIONS OF THE TELEPHONE CONSUMER PROTECTION ACT -
47 U.S.C. § 227, et seq.

21 32. The Plaintiff incorporates by reference all of the above paragraphs of this
22 Complaint as though fully stated herein.
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1 33. Within the last four years, Defendants called Plaintiff on her cellular
2 telephone using an automatic telephone dialing system (“ATDS” or “Predictive
3 Dialer”) and/or by using a prerecorded or artificial voice.
4

5 34. When Plaintiff answered the calls, CMRE used an automated or
6 prerecorded voice prior to connecting the call to a live representative.
7

8 35. CMRE’s telephone systems have the capacity to store or produce
9 telephone numbers to be called, using a random or sequential number generator.
10

11 36. Plaintiff never provided her cellular telephone to CMRE and never
12 provided her consent to be contacted on her cellular telephone, and in fact instructed
13 CMRE on many occasions to stop all calls to her.
14

15 37. The calls from Defendant to Plaintiff were not placed for “emergency
16 purposes” as defined by 47 U.S.C. § 227(b)(1)(A)(i).
17

18 38. Each of the aforementioned calls made by Defendant constitutes a
19 violation of the TCPA.
20

21 39. As a result of each of Defendant’s negligent violations of the TCPA,
22 Plaintiff is entitled to an award of \$500.00 in statutory damages for each call placed in
23 violation of the TCPA pursuant to 47 U.S.C. § 227(b)(3)(B).
24

25 40. As a result of each of Defendant’s knowing and/or willful violations of
26 the TCPA, Plaintiff is entitled to an award of treble damages in an amount up to
27
28

1 \$1,500.00 for each and every violation of the TCPA pursuant to 47 U.S.C.
2 § 227(b)(3)(B) and 47 U.S.C. § 227(b)(3)(C).
3

4 **PRAYER FOR RELIEF**
5

6 WHEREFORE, the Plaintiff prays that judgment be entered against the
7 Defendants:

- 8 A. Actual damages pursuant to 15 U.S.C. § 1692k(a)(1) against the
9 Defendants;
10 B. Statutory damages of \$1,000.00 pursuant to 15 U.S.C. §1692k(a)(2)(A)
11 against the Defendants;
12 C. Costs of litigation and reasonable attorney's fees pursuant to 15 U.S.C.
13 § 1692k(a)(3) against the Defendants;
14 D. Actual damages pursuant to Cal. Civ. Code § 1788.30(a);
15 E. Statutory damages of \$1,000.00 for knowingly and willfully committing
16 violations pursuant to Cal. Civ. Code § 1788.30(b);
17 F. Statutory damages pursuant to 47 U.S.C. § 227(b)(3)(B) & (C);
18 G. Such other and further relief as may be just and proper.

19
20 **TRIAL BY JURY DEMANDED ON ALL COUNTS**
21
22

1 DATED: January 23, 2014
2

TAMMY HUSSIN



3 By: _____
4

5 Tammy Hussin, Esq.
6 Lemberg Law, LLC
7 Attorney for Plaintiff, Dorothy Stewart

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UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I. (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Dorothy Stewart		DEFENDANTS (Check box if you are representing yourself <input type="checkbox"/>) CMRE Financial Services, Inc.	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.) Tammy Hussin, 6404 Merlin Drive, Carlsbad, CA 92011; (855) 301-2300 ext. 5514; of counsel to Lemberg & Associates, LLC, 1100 Summer Street, Third Floor, Stamford, CT 06905; (203) 653-2250		(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same information.)	
II. BASIS OF JURISDICTION (Place an X in one box only.)		III. CITIZENSHIP OF PRINCIPAL PARTIES -For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)	
<input checked="" type="checkbox"/> 1. U.S. Government Plaintiff	<input type="checkbox"/> 3. Federal Question (U.S. Government Not a Party)	Citizen of This State <input type="checkbox"/> 1 <input checked="" type="checkbox"/> 1	Incorporated or Principal Place of Business in This State <input type="checkbox"/> 4 <input checked="" type="checkbox"/> 4
<input type="checkbox"/> 2. U.S. Government Defendant	<input type="checkbox"/> 4. Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State <input type="checkbox"/> 2 <input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State <input type="checkbox"/> 5 <input checked="" type="checkbox"/> 5
		Citizen or Subject of a Foreign Country <input type="checkbox"/> 3 <input checked="" type="checkbox"/> 3	Foreign Nation <input type="checkbox"/> 6 <input checked="" type="checkbox"/> 6
IV. ORIGIN (Place an X in one box only.)		6. Multi-District Litigation	
<input checked="" type="checkbox"/> 1. Original Proceeding	<input type="checkbox"/> 2. Removed from State Court	<input type="checkbox"/> 3. Remanded from Appellate Court	<input type="checkbox"/> 4. Reinstated or Reopened <input type="checkbox"/> 5. Transferred from Another District (Specify) <input type="checkbox"/>
V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		(Check "Yes" only if demanded in complaint.)	
CLASS ACTION under F.R.Cv.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> MONEY DEMANDED IN COMPLAINT: \$ 25,000	
VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 15 USC 1692 - Violations of the Fair Debt Collection Practices Act			
VII. NATURE OF SUIT (Place an X in one box only).			
OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION
<input type="checkbox"/> 375 False Claims Act	<input type="checkbox"/> 110 Insurance	<input type="checkbox"/> 240 Torts to Land	<input type="checkbox"/> 462 Naturalization Application
<input type="checkbox"/> 400 State Reapportionment	<input type="checkbox"/> 120 Marine	<input type="checkbox"/> 245 Tort Product Liability	<input type="checkbox"/> 465 Other Immigration Actions
<input type="checkbox"/> 410 Antitrust	<input type="checkbox"/> 130 Miller Act	<input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL PROPERTY
<input type="checkbox"/> 430 Banks and Banking	<input type="checkbox"/> 140 Negotiable Instrument	<input type="checkbox"/> 310 Airplane	<input type="checkbox"/> 370 Other Fraud
<input type="checkbox"/> 450 Commerce/ICC Rates/Etc.	<input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment	<input type="checkbox"/> 315 Airplane Product Liability	<input type="checkbox"/> 371 Truth in Lending
<input type="checkbox"/> 460 Deportation	<input type="checkbox"/> 151 Medicare Act	<input type="checkbox"/> 320 Assault, Libel & Slander	<input type="checkbox"/> 380 Other Personal Property Damage
<input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org.	<input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.)	<input type="checkbox"/> 330 Fed. Employers' Liability	<input type="checkbox"/> 385 Property Damage Product Liability
<input checked="" type="checkbox"/> 480 Consumer Credit	<input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits	<input type="checkbox"/> 340 Marine	BANKRUPTCY
<input type="checkbox"/> 490 Cable/Sat TV	<input type="checkbox"/> 160 Stockholders' Suits	<input type="checkbox"/> 345 Marine Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158
<input type="checkbox"/> 850 Securities/Commodities/Exchange	<input type="checkbox"/> 190 Other Contract	<input type="checkbox"/> 350 Motor Vehicle Product Liability	<input type="checkbox"/> 423 Withdrawal 28 USC 157
<input type="checkbox"/> 890 Other Statutory Actions	<input type="checkbox"/> 195 Contract Product Liability	<input type="checkbox"/> 360 Other Personal Injury	CIVIL RIGHTS
<input type="checkbox"/> 891 Agricultural Acts	<input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 362 Personal Injury-Med Malpractice	<input type="checkbox"/> 440 Other Civil Rights
<input type="checkbox"/> 893 Environmental Matters	REAL PROPERTY	<input type="checkbox"/> 365 Personal Injury-Product Liability	<input type="checkbox"/> 441 Voting
<input type="checkbox"/> 895 Freedom of Info. Act	<input type="checkbox"/> 210 Land Condemnation	<input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability	<input type="checkbox"/> 442 Employment
<input type="checkbox"/> 896 Arbitration	<input type="checkbox"/> 220 Foreclosure	<input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 443 Housing/Accomodations
899 Admin. Procedures	<input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 445 American with Disabilities-Employment	<input type="checkbox"/> 446 American with Disabilities-Other
<input type="checkbox"/> Act/Review of Appeal of Agency Decision		<input type="checkbox"/> 448 Education	<input type="checkbox"/> 448 Education
950 Constitutionality of State Statutes			
FOR OFFICE USE ONLY:		Case Number: SACV14-00123 DOC (DFMx)	

CIVIL COVER SHEET

VIII. VENUE: Your answers to the questions below will determine the division of the Court to which this case will most likely be initially assigned. This initial assignment is subject to change, in accordance with the Court's General Orders, upon review by the Court of your Complaint or Notice of Removal.

Question A: Was this case removed from state court?	STATE CASE WAS PENDING IN THE COUNTY OF:	
	<input type="checkbox"/> Los Angeles	INITIAL DIVISION IN CACD IS: Western
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question B. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	INITIAL DIVISION IN CACD IS: Western
	<input type="checkbox"/> Orange	INITIAL DIVISION IN CACD IS: Southern
	<input type="checkbox"/> Riverside or San Bernardino	INITIAL DIVISION IN CACD IS: Eastern

Question B: Is the United States, or one of its agencies or employees, a party to this action?	If the United States, or one of its agencies or employees, is a party, is it:		
	<input type="checkbox"/> A PLAINTIFF?	<input type="checkbox"/> A DEFENDANT?	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "no," go to Question C. If "yes," check the box to the right that applies, enter the corresponding division in response to Question D, below, and skip to Section IX.	Then check the box below for the county in which the majority of DEFENDANTS reside.		
	<input type="checkbox"/> Los Angeles	<input type="checkbox"/> Los Angeles	INITIAL DIVISION IN CACD IS: Western
	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	<input type="checkbox"/> Ventura, Santa Barbara, or San Luis Obispo	INITIAL DIVISION IN CACD IS: Western
	<input type="checkbox"/> Orange	<input type="checkbox"/> Orange	INITIAL DIVISION IN CACD IS: Southern
	<input type="checkbox"/> Riverside or San Bernardino	<input type="checkbox"/> Riverside or San Bernardino	INITIAL DIVISION IN CACD IS: Eastern
	<input type="checkbox"/> Other	<input type="checkbox"/> Other	INITIAL DIVISION IN CACD IS: Western

Question C: Location of plaintiffs, defendants, and claims?	A. Los Angeles County	B. Ventura, Santa Barbara, or San Luis Obispo Counties	C. Orange County	D. Riverside or San Bernardino Counties	E. Outside the Central District of California	F. Other
Indicate the location in which a majority of plaintiffs reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of defendants reside:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Indicate the location in which a majority of claims arose:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

C.1. Is either of the following true? If so, check the one that applies:	C.2. Is either of the following true? If so, check the one that applies:
<input checked="" type="checkbox"/> 2 or more answers in Column C <input type="checkbox"/> only 1 answer in Column C and no answers in Column D	<input type="checkbox"/> 2 or more answers in Column D <input type="checkbox"/> only 1 answer in Column D and no answers in Column C
Your case will initially be assigned to the SOUTHERN DIVISION. Enter "Southern" in response to Question D, below. If none applies, answer question C2 to the right. →	Your case will initially be assigned to the EASTERN DIVISION. Enter "Eastern" in response to Question D, below. If none applies, go to the box below. ↓
Your case will initially be assigned to the WESTERN DIVISION. Enter "Western" in response to Question D below.	

Question D: Initial Division?	INITIAL DIVISION IN CACD
Enter the initial division determined by Question A, B, or C above: →	Southern

CIVIL COVER SHEET

IX(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? NO YES

If yes, list case number(s): _____

IX(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? NO YES

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

(Check all boxes that apply)

- A. Arise from the same or closely related transactions, happenings, or events; or
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
- C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**X. SIGNATURE OF ATTORNEY
(OR SELF-REPRESENTED LITIGANT):** _____

DATE: January 23, 2014

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

NOTICE OF ASSIGNMENT TO UNITED STATES JUDGES

This case has been assigned to District Judge David O. Carter and the assigned Magistrate Judge is Douglas F. McCormick.

The case number on all documents filed with the Court should read as follows:

SACV14-00123 DOC (DFMx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge.

Clerk, U. S. District Court

January 29, 2014

Date

By Nancy Boehme

Deputy Clerk

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

Western Division
312 N. Spring Street, G-8
Los Angeles, CA 90012

Southern Division
411 West Fourth St., Ste 1053
Santa Ana, CA 92701

Eastern Division
3470 Twelfth Street, Room 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.